

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

UNITED STATES OF AMERICA,

**Case No. 23-80101-CR
CANNON/REINHART**

vs.

DONALD J. TRUMP,
WALTINE NAUTA, and
CARLOS DE OLIVEIRA,

Defendants.

PRESIDENT TRUMP’S MOTION FOR LEAVE TO FILE CONSOLIDATED BRIEF

President Donald J. Trump respectfully submits this motion for leave to (1) file a consolidated brief in support of his pretrial motions that aggregates the page limits under the Local Rules; (2) submit an unredacted version of the consolidated brief to the Court and counsel via email on the night of February 22, 2024, with a hard copy of the February 22 submission to be filed temporarily under seal with the Clerk of the Court on February 23; and (3) file a redacted version of the consolidated brief on the public docket on the night of February 22, which will allow additional time to address any sealing applications by the Special Counsel’s Office relating to discovery materials or other potentially sensitive issues discussed in the consolidated brief.¹

On February 22, 2024, President Trump intends to file at least 10 pretrial motions concerning, for example, the appointment of Jack Smith, presidential immunity, the Presidential Records Act, selective and vindictive prosecution, the unconstitutional vagueness of 18 U.S.C. § 793(e), due process violations, prosecutorial misconduct, impermissible preindictment delay, the

¹ The Special Counsel’s Office consents to President Trump’s motion for permission to file a consolidated brief as requested above, and takes no position on the requests concerning temporary sealing and redactions. President Trump consents to the Office filing a consolidated brief in opposition to the motions, subject to the same page limitations sought herein. Defendants Waltine Nauta and Carlos De Oliveira plan to file additional pretrial motions in separate briefs.

illegal raid at Mar-a-Lago, and improper violations of President Trump's attorney-client privilege. Similar to the motions to compel, for the sake of efficiency and in order to avoid requiring separate filings for each motion, President Trump respectfully requests permission to file a single consolidated brief in support of his pretrial motions not to exceed the 200 pages in aggregate that are contemplated by the Local Rules for these motions. President Trump anticipates that such a consolidated brief will be shorter than that aggregated page limit, but is seeking permission for that page limit in an abundance of caution as his counsel finalizes the motions in the coming days.

President Trump's pretrial motions will discuss, and attach, discovery materials covered by the Protective Order, which the Special Counsel's Office may regard as sensitive and/or worthy of sealing. Accordingly, President Trump also requests permission to submit an unredacted version of the consolidated brief via email to the Court and all counsel on the night of February 22, 2024, and to file a hard copy of the unredacted consolidated brief temporarily under seal with the Clerk of the Court on February 23 (along with an application for temporary sealing pursuant to the Protective Order, related Orders of the Court, and this application). Finally, because of the pending motion for reconsideration concerning sealing by the Special Counsel's Office, President Trump further requests permission to file a redacted version of the consolidated brief on the public

docket on the night of February 22, 2024, with redactions that comply with the Protective Order and Local Rules. *See* ECF Nos. 283, 294, 295 (ordering the Defendants to respond to the motion for reconsideration on February 23).

Dated: February 20, 2024

Respectfully submitted,

/s/ Todd Blanche

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CERTIFICATE OF SERVICE

I, Christopher M. Kise, certify that on February 20, 2024, I electronically filed the foregoing document with the Clerk of Court using CM/ECF.

/s/ Christopher M. Kise
Christopher M. Kise